

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
RAFAEL RAMOS SANTOS &
JOHANA MARRERO BOU
SS #7730 / SS #9804
Debtors

BANKRUPTCY 15-06238 MCF
CHAPTER 13

Confirmation Hearing 8/3/2017

NOTICE OF FILING COUNSEL FOR DEBTOR'S FIRST APPLICATION FOR
PAYMENT OF FEES & COSTS FOR PERIOD OF 3/5/2015 to 4/30/2017

PLEASE TAKE NOTICE that on May 2, 2017, L.A. Morales & Associates, P.S.C., Lyssette Morales Vidal counsel for the above-captioned debtors filed her Application for Payment of Fees and Costs for the period of March 5, 2015 to April 30, 2017 [the "Application"].

PLEASE TAKE FURTHER NOTICE that objections, if any to approval of the Application must be in writing, filed with the United States Bankruptcy Court for the District of Puerto Rico [the "Bankruptcy Court"], José V. Toledo Federal Bldg and United States Courthouse, 300 Calle del Recinto Sur, San Juan, Puerto Rico 00901-0901, served so as to be received 14 days from mailing + 3 days for mailing.

PLEASE TAKE FURTHER NOTICE that a hearing on the Application has not been scheduled as of yet, but may be scheduled if objections to the Application are timely filed and served on all relevant parties: L.A. Morales Esq., Urb Villa Blanca, 76 Aquamarina, Caguas, Puerto Rico 00725-1908, or may be scheduled at the Court's discretion. Only objections made in writing [in English] and timely filed and received will be considered by the Bankruptcy Court if a hearing is scheduled.

DATED: May 2, 2017

s/ *L.A. Morales*, USDC PR #120011
LYSSETTE MORALES VIDAL
L.A. MORALES & ASSOCIATES P.S.C.
URB VILLA BLANCA, #76 AQUAMARINA
CAGUAS, PUERTO RICO 00725-1908
TEL: 746-2434 / 258-2658
lamoraleslawoffice@gmail.com

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
RAFAEL RAMOS SANTOS &
JOHANA MARRERO BOU
SS #7730 / SS #9804
Debtors

BANKRUPTCY 15-06238 MCF
CHAPTER 13

Confirmation Hearing 8/3/2017

FIRST FEE APPLICATION OF L.A. MORALES, COUNSEL
TO THE DEBTORS, for PAYMENT OF FEES & COSTS for PERIOD
FROM March 5, 2015 THROUGH April 30, 2017

Name of Applicant:	L.A. Morales & Associates P.S.C.
Name of Client:	RAFAEL RAMOS SANTOS & JOHANA MARRERO BOU
Date of Retention by debtors:	May 5, 2015
Period Covered:	March 5, 2015 to April 30, 2017
Amount of Compensation sought as actual, reasonable & necessary:	\$33,793.73^a
Amount of Expenses Reimbursement sought as actual, necessary & necessary:	\$367.10

ATTORNEY/OTHER PROFESSIONAL SUMMARY

Name of Atty	Yrs Admitted	Hours Billed	Hourly Rate ^b	Total
L.A. Morales	40	210.22	\$275	\$57,809.50
		10.42	\$200	\$2,084
		8	\$137.50	\$1,100
Irma Pastor, Assist.	10 yrs	10	\$75	\$750

^a This represents \$62,110.60 gross amount of attorney fees & costs owed which has been discounted at 45%, for a balance of \$34,160.83, less deposit paid by debtors of \$8,485 to assist debtors in their bankruptcy effort for a net balance owed of \$25,675.83 for fees & expenses. Applicant has agreed to limit payment to \$10,000 under the Amended Plan dated 4/18/2017 to enable & for purposes of confirmation of the chapter 13 Plan.

^b The agreed hourly rate w/ debtors is at \$275 but in an effort to cooperate with the reorganization effort of the debtors, the rate has been adjusted & reduced for some tasks: meetings at \$200 p/hour; & travel at ½ of hourly rate or at \$137.50 p/hour of travel. The total gross amount owed represents a 'blended' rate of attorney fees which has been discounted at 45% to enable rehabilitation process and confirmation of the chapter 13 Plan.

TOTAL NonLawyer & Professionals		238.64		\$61,743.50
TOTAL Hrs & Fees		238.64		\$62,110.60

EXPENSE SUMMARY

Office Copying Service	\$50
Appeal Filing Fee	\$298
Parking	\$19.10
TOTAL	\$367.10

s/*L.A. MORALES*

USDC PR #120011

L.A. MORALES & ASSOCIATES P.S.C.

URB VILLA BLANCA

#76 AQUAMARINA

CAGUAS, PUERTO RICO 00725-1908

TEL. 787-746-2434/258-2658

Fax 1-855-298-2515

E-MAIL: lamoraleslawoffice@gmail.com

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE
RAFAEL RAMOS SANTOS &
JOHANA MARRERO BOU
SS #7730 / SS #9804
Debtors

BANKRUPTCY 15-06238 MCF
CHAPTER 13

Confirmation Hearing 8/3/2017

COUNSEL FOR DEBTOR'S FIRST APPLICATION FOR PAYMENT OF FEES & COSTS
FOR PERIOD OF 3/5/2015 to 4/30/2017

Debtor by counsel, Lyssette A. Morales Vidal, Esq., of L.A. Morales & Associates P.S.C, hereby makes its first application [the "Application"] for the period of March 5, 2015 to April 30, 2017, and in support thereof as applicant in this matter, respectfully files this application for allowance of compensation and reimbursement of expenses, who represents and states as follows:

1. This application is submitted in compliance with the Guidelines of the US Trustee Office, for the review of applications for professional compensation and reimbursement of expenses.
2. Background:
 - a. Debtors filed this petition for relief under chapter 13 of the Bankruptcy Code on August 15, 2015. Debtors have continued operating a business in that of rentals and electrician services as a d/b/a since the filing of the petition.
 - b. Debtors have filed MOR's as required and are current under their Plan having paid a total of \$13,500, or 20 installments accrued to date;
 - c. Since the filing of the case, there have been objections [11] to confirmation by the C13 Trustee and objections to exemptions and claims and agreement for valuation of collateral with secured creditor, BCU, all of which have been defended, responded and diligently sought by counsel for debtors throughout these proceedings;
 - d. The objections to confirmation to the 4 Plans filed by debtors, almost entirely by the chapter 13 Trustee, extended the confirmation process, resulting in the

dismissal on secured creditor, Baxter Credit Union's [BCU] second *Motion to Dismiss* at doc #100;

- e. The case was dismissed on October 20, 2016, and an Appeal [16-060] filed before the B.A.P. for the First Circuit on November 3, 2016. As of March 27, 2017 debtors filed their Appeal brief while simultaneously they continued to seek settlement with Appellee, BCU and to procure a favorable recommendation from the Trustee in debtors' constant effort to mitigate the cost of the appeal process for all parties;
 - f. Upon the preliminary settlement of the issues in the case after dismissal and during the pending Appeal, debtors sought and obtained the setting aside of the dismissal by the bankruptcy Court at doc #137. The bankruptcy case was reinstated on April 17, 2017 at doc #139. Accordingly, debtors requested and were granted the voluntary dismissal of their appeal before the B.A.P. for the First Circuit Court of Appeals;
 - g. The proposed Chapter 13 Plan dated April 18, 2017 filed at doc #140 offers a total of \$61,500 for distribution to debtors' secured, priority, priority administrative and unsecured creditors in debtors' effort to maximize dividends to their creditors;
 - h. Debtors' proposed Amended Plan dated April 18, 2017 represents debtors' best effort and counsel for debtors believes that debtors have the capacity, *albeit* with sacrifice, and the motivation for the successful completion of the Plan as proposed;
 - i. The Amended Chapter 13 Plan dated April 18, 2017 has been scheduled by the Court for confirmation hearing for **August 3, 2017** at 9:00 a.m. The chapter 13 Trustee has unfavorably recommended this Plan requesting that the value of the Corozal property be amended to its original value of \$110,000.
3. The hourly rates agreed to by applicant and debtors, disclosed in the amended Rule 2016 Statement filed at doc #143, for the attorney were as follows:

Lyssette Morales Vidal, Esq	\$275.00 per hour ^c
Irma Pastor – Legal Assistant	\$ 75.00 per hour

^c Hourly rate is at \$275 but in some tasks billing has been adjusted & reduced: meetings at \$200 p/hour & travel at ½ of hourly rate, or at \$137.50 p/hour of travel.

4. Professional services for which allowance of compensation and reimbursement of expenses is sought were performed during the period from March 5, 2015 through April 30, 2017.
 - a. This is applicant's first professional fee application.
5. The attorney fees and expenses accrued in this case reach a gross amount of **\$62,110.60**, for work spanning more than 2 years by Applicant, amount which Applicant is willing to adjust and discount at 45% reduction to enable the case to go forward to confirmation and to cooperate in debtors' reorganization effort.
6. Debtors have paid a deposit of \$8,485, of which \$5,000 was paid pre-petition and \$3,485 was paid during the dismissed case on January 10, 2017 and February 24, 2017, to defray the mounting cost of their bankruptcy case and the appeal.
7. Applicant accepts that for confirmation purposes the balance of her fees be limited to \$10,000 under the Plan to be confirmed, with the request that any future funds that may become available to debtors during or after completion of their chapter 13 case, or become available to the Estate, respond for the balance owed of the discounted amount, or the balance of **\$17,190.83**.
8. A summary of professional time and fees requested, and for which this application is filed is provided at pages 2 and 3 of this Application.
9. Applicant provides an itemized description of services rendered with entries organized in chronological order within each project category pursuant to the Guidelines for Reviewing Applications for Compensation & Reimbursement of Expenses Filed Under 11 USC § 330. This breakdown is filed and made part of this application at **Exhibit #1**.
10. Applicant hereby certifies that the enclosed breakdown of fees and expenses has been reviewed by debtors.
11. I hereby certify that to the best of my professional knowledge, information and belief formed after reasonable inquiry, the instant Application for Compensation and Reimbursement of Expenses conforms with the Guidelines of the U.S. Trustee and that the compensation and expenses reimbursement requested herein are actual and necessary and have been billed at rates in accordance with customary practices being these no less favorable to the estate than those customarily employed.

WHEREFORE, applicant respectfully prays to this Honorable Court to enter an order allowing the compensation and reimbursement of necessary expenses sought herein in the total discounted amount of **\$25,675.83** of which **\$25,308.73** correspond to professional fees and **\$367.10** for the reimbursement of necessary expenses. The retainer of \$8,485 paid has been credited to the account, thereby reducing the total balance owed and due in fees and expenses to **\$17,190.83** amounts which counsel for debtor requests payment as an administrative expense allowable under 11 U.S.C. §503(h) and §330. Applicant accepts that of the net and discounted amount owed, that **\$10,000** be paid to her under the Plan for purposes of confirmation.

NOTICE TO PARTIES IN INTEREST

PLEASE TAKE NOTICE that unless a written objection to this fee application is filed within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (I) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE

That on this same date a true and exact copy of this Fee Application has been electronically filed and caused to be noticed to all parties' participant in CmECF which includes the U.S.T. and the C13 Trustee.

15-06238-BKT13 Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES newecfmail@ch13-pr.com

MIGDALIA EFFIE GUASP on behalf of BPPR - SPECIAL LOANS

meqbky@bppr.com, migdalia.guasp@popular.com, migdalia.guasp@popular.com

ROSAMAR GARCIA FONTAN on behalf of Creditor BAXTER CREDIT UNION

rgarcia@fglaw.com, rgarcia@ecf.courtdrive.com; acordero@fglaw.com; lferran@fglaw.com; rcabrera@fglaw.com; cmos

coso@fgrlaw.com

MONSITA LECAROS ARRIBAS ustpreion21.hr.ecf@usdoj.gov

SERGIO A RAMIREZ DE ARELLANO on behalf of BPPR sramirez@sarlaw.com, sramirez@ecf.courtdrive.com

EDUARDO M VERAY on behalf of BPPR - SPECIAL LOANS eduardo.veray@popular.com, eduardoveray@gmail.com

By regular mail to creditors on attached Matrix

DATED: May 2, 2017

s/ *L.A. MORALES*

LYSSETTE MORALES VIDAL

USDC PR #120011

L.A. MORALES & ASSOCIATES P.S.C.

URB VILLA BLANCA

#76 AQUAMARINA STREET

CAGUAS, PUERTO RICO 00725-1908

TEL.: 746-2434 / 258-2658

FAX 1-855-298-2515

E-MAIL: lamoraleslawoffice@gmail.com

L A Morales & Associates P.S.C.
 Urb Villa Blanca
 76 Aquamarina
 Caguas PR 00725-1908
 Puerto Rico

Bankruptcy Counsel for Debtor

Rafael Ramos Santos & Johana Marrero Bou
 Johana Marrero Bou
 Costa de Oro
 E 108 Calle C
 Dorado PR 00646

Invoice # 0000022
 Invoice Date April 30, 2017
Balance Due (USD) \$25,675.83

Task	Time Entry Notes	Rate	Hours	Line Total
INITIAL INTERVIEW	[Rafael Ramos Santos & Johana Marrero Bou 03/05/15] Lyssette Morales Vidal: Initial interview & analysis of financial situation, review of credit reports (2), property values & projected cost of representation & projected plan payments; evaluated pro's & con's of both C13 vis a vis C11	200.00	4.5	900.00
INITIAL INTERVIEW	3/05/2015 After interview w/ clients prepared list of creditors & updated list of documents in view of discussion in initial interview	200.00	1.5	300.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 04/15/15] Lyssette Morales Vidal: Follow up w/ debtors via email & call regarding filing of case	200.00	0.2	40.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 05/05/15] Lyssette Morales Vidal: Met w/ debtors to discuss contract for professional services & discuss which chapter they have decided C13 or C11 which I have recommended is the more appropriate chapter to reorganize.	200.00	1	200.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 05/05/15] Lyssette Morales Vidal: Drafted professional services contract & reviewed case for meeting with debtors for tomorrow.	275.00	1	275.00
INITIAL INTERVIEW	[Rafael Ramos Santos & Johana Marrero Bou 07/10/15] Lyssette Morales Vidal: Receipt & review of preliminary documentation required for interview & met extensively once again due to length of time since initial interview w/ clients & evaluated financial situation & recommended C11 as most appropriate chapter for filing	275.00	2.5	687.50
DATA ENTRY &/Or REVIEW of DRAFTS	[Rafael Ramos Santos & Johana Marrero Bou 07/13/15] Lyssette Morales Vidal: Review of preliminary data entered by Assistant in preparation for filing of case after meeting & being retained today by debtors	75.00	2	150.00
REVIEW &/or SUBMIT/RECEIVE DRAFT	[Rafael Ramos Santos & Johana Marrero Bou 07/15/15] Lyssette Morales Vidal: Continued to correspond & exchange drafts of schedules with debtors via email in preparation of filing of case	200.00	1	200.00

Task	Time Entry Notes	Rate	Hours	Line Total
DATA ENTRY &/Or REVIEW of DRAFTS	[07/22/15] Continued reviewing & renewing drafts of petition & schedules exchanging drafts w/ clients in preparation of filing of petition & schedules	75.00	2	150.00
Review of Schedules & Drafts	[Rafael Ramos Santos & Johana Marrero Bout 08/08/15] Lyssette Morales Vidal: Last sweep & review of VP & Schedules & proposed C13 Plan for filing & case filed today	75.00	3	225.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bout 08/08/15] Lyssette Morales Vidal: Ds in office for review & signing of VP previously sent via email several times in that of drafts	200.00	0.4	80.00
REVIEW &/or SUBMIT/RECEIVE DRAFT	[Rafael Ramos Santos & Johana Marrero Bou 08/09/15] Lyssette Morales Vidal: Reviewed property values & LV in preparation for drafting of Plan in conjunction to drafts of schedules prepared in this case for filing this week.	200.00	2	400.00
Meetings	8/15/2015 Met w/ debtor for line by line review signing of VP to be filed today after exchanging several drafts via email for their review	200.00	0.4	80.00
REVIEW &/or SUBMIT/RECEIVE DRAFT	8/15/2015 Review of filed case & amended error in VP a/k/a by attorney	200.00	0.2	40.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 08/17/15] Lyssette Morales Vidal: Receipt & review of Notice of Meetings & BD & calendered meetings & bar dates	200.00	0.2	40.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 08/28/15] Lyssette Morales Vidal: Drafted & filed Motion for Mediation at doc #14	275.00	0.4	110.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 08/31/15] Lyssette Morales Vidal: Drafted & filed doc #15 for Continuance of §341 after communication w/ Trustee Office in this regard	275.00	0.2	55.00
REVIEW &/or SUBMIT/RECEIVE DRAFT	[Rafael Ramos Santos & Johana Marrero Bou 09/22/15] Lyssette Morales Vidal: Drafted & Amended Schedule A w/ CoverSheet Justifying Amendment & filed at doc #18	200.00	0.1	20.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 09/24/15] Lyssette Morales Vidal: Drafted & filed Motion for Continuance of 9/28/2015 §341	275.00	0.2	55.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 09/30/15] Lyssette Morales Vidal: Receipt & preliminary review of UF Rpt on Confirmation contained in Minutes of §341 not heard filed at doc #22 & logged doc & calendered action	200.00	0.2	40.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bout 10/07/15] Lyssette Morales Vidal: Receipt & preliminary review of BCU Mt Extension of Time to Object to Plan & Intent to Object & Request Extension of Time recorded doc #24 & logged doc & calendered action	200.00	0.1	20.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bout 10/18/15] Lyssette Morales Vidal: Drafted D Response to Trustee's UF	275.00	2.2	605.00

Task	Time Entry Notes	Rate	Hours	Line Total
	Rpt on Confirmation filed at doc #22 & filed D Response at doc #29			
REVIEW &/or SUBMIT/RECEIVE DRAFT	[Rafael Ramos Santos & Johana Marrero Bou 10/19/15] Lyssette Morales Vidal: Reviewed & prepared Amended Schedules including I w/ Business Income & Expenses RRS & Rentals, Second C13 Statement of CMI Form 22C-1, Sch B & C to add tools & adjust Exemptions & emailed same to Ds for approval & filing	200.00	2.4	480.00
REVIEW &/or SUBMIT/RECEIVE DRAFT	[Rafael Ramos Santos & Johana Marrero Bou 10/20/15] Lyssette Morales Vidal: Prepared for filing Ds Amendment to Schedules approved by debtors & drafted & filed CoverSheet Justifying Amendment filed at docs #30, #31 & #32	200.00	1	200.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 10/26/15] Lyssette Morales Vidal: Receipt & reviewed Notice of Mortgage Payment Change & reviewed clm #5 filed by BPPR & logged doc	200.00	0.2	40.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 12/04/15] Lyssette Morales Vidal: Receipt & review of §362 Mt filed by BPPR at doc #36 & logged doc & calendered action	200.00	0.2	40.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bout 12/07/15] Lyssette Morales Vidal: Receipt & preliminary review of Trustee's Position re §362 Mt filed at doc #36 & logged doc. NO Charge	200.00	0	0.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bout 01/04/16] Lyssette Morales Vidal: Receipt & review of Claim Transfer Agreement 3001 & logged doc No Charge	200.00	0	0.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bout 01/12/16] Lyssette Morales Vidal: Met & prepared Ds for §341 by reviewing entire VP & Schedules	200.00	1	200.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bout 01/25/16] Lyssette Morales Vidal: Receipt & preliminary review of BPPR Objection to Confirmation of Plan filed at doc #50 & logged doc & calendered action	200.00	0.1	20.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bout 02/18/16] Lyssette Morales Vidal: Receipt & preliminary review of BCU Motion to Dismiss filed at doc # 51	200.00	0.1	20.00
CLAIMS ADM & OBJECTIONS	[Rafael Ramos Santos & Johana Marrero Bou 02/21/16] Lyssette Morales Vidal: Reviewed relevant claims as these pertain to the Plan & adjusted plan provisions as needed as per review of claims for objections to these &/or to reach out to creditor for negotiation of claim or value of collateral.	275.00	2	550.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 02/21/16] Lyssette Morales Vidal: Reviewed file & legal dockets & organized pertinent doc entries in preparation to reply to doc #50 & #51 to begin drafts of replies	200.00	2.4	480.00

Task	Time Entry Notes	Rate	Hours	Line Total
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 02/21/16] Lyssette Morales Vidal: Drafted & filed Response to BPPR's Objection to Confirmation at doc #52 on this same date	275.00	1	275.00
CLAIMS ADM & OBJECTIONS	[Rafael Ramos Santos & Johana Marrero Bou 02/21/16] Lyssette Morales Vidal: Communicated w/ debtors & forwarded claims analyzed today for their review & confirmation of amount of default in each of the claims & forwarded draft of new & amended plan to be filed upon their approval	275.00	2	550.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bout 02/22/16] Lyssette Morales Vidal: Continued review & organization of file & several communications w/ Ds & Office of Trustee in preparation for 2/23/2016 §341 tomorrow	275.00	2	550.00
TRAVEL to & from HEARING/Meeting SJ / Caguas	[Rafael Ramos Santos & Johana Marrero Bout 02/23/16] Lyssette Morales Vidal: Travel to & from §341 Caguas to OSJ	137.50	2	275.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bout 02/23/16] Lyssette Morales Vidal: Waited & appeared at §341	275.00	1	275.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 02/26/16] Lyssette Morales Vidal: Settled valuation issue w/ Baxter through Legal Assistant	75.00	0.2	15.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 02/26/16] Lyssette Morales Vidal: Amended Plan as per settlement w/ Baxter to pay value of collateral; verified sufficiency needed for Amended Plan; again verified claims to be paid under the Plan & filed Amended Plan at doc #55 & noticed the Plan	275.00	2	550.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 02/26/16] Lyssette Morales Vidal: Drafted & filed at doc #56 response to Baxter Motion to Dismiss & Objection to Confirmation of Plan	275.00	0.4	110.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 02/26/16] Lyssette Morales Vidal: Reviewed, organized & drafted Response to Trustee's Unfavorable Report thru verification of repeated document upload & responses to Trustee to incorporate in Response filed at doc #57	275.00	2	550.00
CASE ADMINISTRATION	[02/26/16] drafted letter in conformance with settlement agreement sent to counsel for Baxter, Rosana Garcia Fontán, Esq.	275.00	0.2	55.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 02/26/16] Lyssette Morales Vidal: Receipt & preliminary review of BCU Objection to Confirmation of Plan filed at doc #54	200.00	0.2	40.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 03/07/16] Lyssette Morales Vidal: Receipt & preliminary review of Trustee UF Rpt on Confirmation	200.00	0.2	40.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 03/08/16] Lyssette Morales Vidal: Reviewed file & Trustee's Objections at doc #53 & #57 & addressed each of these one	275.00	2	550.00

Task	Time Entry Notes	Rate	Hours	Line Total
	by one making reference & searching evidence to contradict each of the objections.			
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 03/08/16] Lyssette Morales Vidal: Communicated throughout the day w/ debtors via email in regard to inheritance & information needed to amend Schedules	200.00	0.4	80.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 03/08/16] Lyssette Morales Vidal: Reviewed LV analysis for this case again & analyzed LV provided by BestCase & amended Schedules B & C to include omitted inheritance	275.00	0.4	110.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 03/09/16] Lyssette Morales Vidal: Drafting & review of Debtors' 8 page Response to Trustee's Objections at doc #53 & #57 w/ attachments & filed today at doc #59	275.00	2	550.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 03/28/16] Lyssette Morales Vidal: Receipt & preliminary review of UF Rpt on Confirmation filed by Trustee at doc #61	200.00	0.2	40.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 03/30/16] Lyssette Morales Vidal: Receipt & preliminary review of Objection Exemptions filed by Trustee at doc #63	200.00	0.1	20.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 03/31/16] Lyssette Morales Vidal: Receipt & preliminary review of BCU Objection to Confirmation filed at doc #63	200.00	0.2	40.00
REVIEW &/or SUBMIT/RECEIVE DRAFT	[Rafael Ramos Santos & Johana Marrero Bou 04/13/16] Lyssette Morales Vidal: Amended Sch C in response to Trustee's Objection, drafted CoverSheet Justifying Amendment & filed at doc #64	200.00	0.4	80.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 04/19/16] Lyssette Morales Vidal: Telephone conference w/ counsel for Baxter re Agreement of Value to be paid under Plan & submission of Joint Agreement	200.00	0.4	80.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 04/20/16] Lyssette Morales Vidal: Organized & Drafted Ds Response to UF Report on Confirmation doc #61 [4th Rpt on Confirmation]	275.00	2.2	605.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 04/22/16] Lyssette Morales Vidal: Exchanged draft of Stipulation w/ counsel for Baxter for signing off & filing by Baxter at doc #66	200.00	0.4	80.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 04/26/16] Lyssette Morales Vidal: Prepared & reviewed case file in preparation for 4/28/2016 hearing on confirmation, prepared Response to yet another 5th & 6th UF Rpt on Confirmation filed by Trustee yesterday & today after revision of past Responses to Trustee re UF Reports on Confirmation, reviewed tables analysis of liquidation value submitted in case to compare & contrast to Trustee's analysis received	275.00	4.4	1,210.00

Task	Time Entry Notes	Rate	Hours	Line Total
	yesterday, 1 1/2 days prior to 4/28/2016 Hearing on Confirmation			
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 04/27/16] Lyssette Morales Vidal: Receipt, review & comparison of Amended UF Rpt on Confirmation w/ doc #68 w/ Amended RPT filed by Trustee at doc #69	200.00	0.2	40.00
TRAVEL to & from HEARING/Meeting SJ / Caguas	[Rafael Ramos Santos & Johana Marrero Bou 04/28/16] Lyssette Morales Vidal: Traveled to & from Caguas to OSJ to Confirmation Hearing	137.50	2	275.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 04/28/16] Lyssette Morales Vidal: Waited & appeared at Confirmation hearing which was continued to 7/7/2016	275.00	1	275.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 05/12/16] Lyssette Morales Vidal: Traveled to & from SJ for meeting w/ Trustee & meeting not held b/c Trustee was not in despite having given us this date & time to meet w/ her.	200.00	2	400.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 05/12/16] Lyssette Morales Vidal: Waited at Office of Trustee for appt w/ Staff Attorney but she never showed up	200.00	0.4	80.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 06/21/16] Lyssette Morales Vidal: Receipt & preliminary review of Trustee Objection to Clm #13 filed by Debtor on behalf of Treasury	200.00	0.2	40.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 06/27/16] Lyssette Morales Vidal: Reviewed case file & organized documentation in preparation for drafting & drafted Ds' Opposition to Trustee's 5th & 6th UF Rpt on Confirmation & filed at doc #80	275.00	2	550.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 07/04/16] Lyssette Morales Vidal: Continued preparation for confirmation for hearing on confirmation this week; continued revision of exemptions, liquidation value of estate by redoing & re verifying claims & values of POE.	275.00	4.4	1,210.00
CLAIMS ADM & OBJECTIONS	[Rafael Ramos Santos & Johana Marrero Bou 07/04/16] Lyssette Morales Vidal: Drafted for filing & approval of Ds Amendment to Schedules A/B & C after reviewing values & balances as per claims on file & electronically submitted to Ds for approval.	275.00	1.4	385.00
CLAIMS ADM & OBJECTIONS	[Rafael Ramos Santos & Johana Marrero Bou 07/05/16] Lyssette Morales Vidal: Drafted & filed Response to Trustee Objection to Treasury claim & amended the same to provide signature on claim filed on behalf of Treasury & adjust claim accordingly	275.00	1.16	319.00
REVIEW &/or SUBMIT/RECEIVE DRAFT	[Rafael Ramos Santos & Johana Marrero Bou 07/05/16] Lyssette Morales Vidal: Filed at doc #81 Amendments approved by Ds electronically	200.00	0.2	40.00

Task	Time Entry Notes	Rate	Hours	Line Total
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 07/06/16] Lyssette Morales Vidal: Continued preparation for confirmation hearing this week. Contacted debtor for an emergency meeting regarding change in LV in case & contacted Trustee reaching out to consider amending her LV from \$49,000 to lowering it in view of declining value of properties.	275.00	2.18	599.50
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 07/06/16] Lyssette Morales Vidal: Meeting w/ debtor spouse to discuss increased LV & capacity to fund a higher base & plan	200.00	1.12	224.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 07/06/16] Lyssette Morales Vidal: Drafted new Plan & amended Schedule A, amended LV Excel to include as exhibits once again but this time to lower value of Corozal property in an effort to lower what Trustee insists is the LV of this Estate despite our analysis submitted to Trustee on several occasions	275.00	3.36	924.00
TRAVEL to & from HEARING/Meeting SJ / Caguas	[Rafael Ramos Santos & Johana Marrero Bou 07/07/16] Lyssette Morales Vidal: Travel to & back to hearing on confirmation	137.50	2	275.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 07/07/16] Lyssette Morales Vidal: Waited & appeared at confirmation hearing & continued negotiations w/ Trustee while awaiting Judge to appear, finally accepting a continuance on Trustee's insistence to further evaluate recent amendments by debtors.	275.00	2	550.00
Receipt, review, log &o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 07/19/16] Lyssette Morales Vidal: Receipt & preliminary review of UF Rpt on Confirmation filed by Trustee at doc #87	200.00	0.2	40.00
Receipt, review, log &o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 07/28/16] Lyssette Morales Vidal: Receipt & preliminary review of Objection Exemptions filed by Trustee at doc #88	200.00	0.1	20.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 08/12/16] Lyssette Morales Vidal: Continued review of Obj by C13 Trustee to Exemption re tools of trade, legal investigation for response & drafted motion for filing. Response filed today at doc #89	275.00	1	275.00
Draft & prepare pleadings	[Rafael Ramos Santos & Johana Marrero Bou 08/13/16] Lyssette Morales Vidal: Reviewed T's 7th UF Rpt on Confirmation, reviewed entire case, re analyzed LV & redid Excel LV Analysis for each property to ascertain that in fact the Plan complies w/ LV notwithstanding Trustee's Objection(s). Drafted response to T's Objection to Confirmation & filed at doc #90.	275.00	3	825.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 08/13/16] Lyssette Morales Vidal: Drafted & sent via email another email to counsel for Trustee regarding most recent analysis	275.00	1.38	379.50

Task	Time Entry Notes	Rate	Hours	Line Total
	of LV in animus to settle before confirmation & avoid unnecessary additional fees			
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 08/26/16] Lyssette Morales Vidal: Receipt & preliminary review of Trustee's UF Rpt on Confirmation filed at doc #91	200.00	0.2	40.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 09/02/16] Lyssette Morales Vidal: Review of file & pleadings by Trustee & amended & prepared Amended Schedule I & J for debtors' signature & for filing w/ Amended Business Income & Expense Form for Rentals	275.00	2	550.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 09/04/16] Lyssette Morales Vidal: Once again revised 7 [sic 8] prior objections by Trustee in preparation for hearing on confirmation & to respond to Trustee's 8th [sic 9th] UF Rpt on Confirmation & drafted the Response Thereto & filed at doc #98.	275.00	3	825.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 09/04/16] Lyssette Morales Vidal: Reviewed prior proposed Plan filed at doc #84 & drafted an entirely different Plan in that the new Alternate Plan reduces payout to creditors under circumstances of the repeated objections by Trustee to payout proposed under 3 prior plans & debtors inability to increase Plan payments & payout. Filed new and Alternate Plan at doc #96.	275.00	2	550.00
TRAVEL to & from HEARING/Meeting SJ / Caguas	[Rafael Ramos Santos & Johana Marrero Bou 09/08/16] Lyssette Morales Vidal: Travel to & from hearing on Confirmation from Caguas to OSJ	137.50	2	275.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 09/08/16] Lyssette Morales Vidal: Wait & appear at hearing on confirmation continued to 12/8/2016	275.00	1	275.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 09/09/16] Lyssette Morales Vidal: Receipt & preliminary review of BCU Second MTD	200.00	0.2	40.00
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 09/16/16] Lyssette Morales Vidal: Receipt & preliminary review of Trustee's UF Rpt on Confirmation filed at doc #103	200.00	0.2	40.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 10/07/16] Lyssette Morales Vidal: Revision of claims docket w/ amended claims as these pertain to new & repeated UF Reports on Confirmation filed by Trustee at doc #103 & drafted Response thereto for filing & filed at doc #105.	275.00	4.97	1,366.75
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 10/07/16] Lyssette Morales Vidal: Review past objections & replies to Baxter in preparation for reply to their Second MTD & filed repeated response: the delay to confirmation cannot be attributed to debtors. Filed response & opposition at doc #106	275.00	1.5	412.50

Task	Time Entry Notes	Rate	Hours	Line Total
Receipt, review, log &/o calendar CmECF docs	[Rafael Ramos Santos & Johana Marrero Bou 10/20/16] Lyssette Morales Vidal: Receipt & preliminary review & analysis of Dismissal & Amended Dismissal at docs #107 & 108	200.00	0.3	60.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 10/20/16] Lyssette Morales Vidal: Review of entire file & researched dismissal of contested motion to dismiss	275.00	1	275.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 11/01/16] Lyssette Morales Vidal: Legal research in preparation for Rule 59 motion to vacate, alter or amend Dismissal Order.	275.00	2.5	687.50
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 11/02/16] Lyssette Morales Vidal: Continued legal research & commenced drafting of Rule 59 motion to vacate alter or amend dismissal & Request Entry of Addiitional Findings of Fact & Conclusions of Law, idea which I abandoned in favor of Appeal due to constant power outages that would not allow extensive work on computers.	275.00	3	825.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 11/03/16] Lyssette Morales Vidal: Drafted Notice of Appeal & Statement of Election instead of Rule 59 motion due to continous power outages & filed Appeal at doc #111	275.00	0.4	110.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 11/04/16] Lyssette Morales Vidal: Meeting w/ debtor spouse to discuss the dismissal of their case & evaluate options & need to have filed Appeal prior to discussion w/ them due to continued power outages that risked not being able to complete research & drafting of Rule 59 Motion to Vacate & Request for Additional Findings of Fact & Law commenced upon dismissal.	275.00	2	550.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 11/14/16] Lyssette Morales Vidal: Commenced organization of Appeal w/ Designation of Record	275.00	3.94	1,083.50
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 11/30/16] Lyssette Morales Vidal: Continued adding & revising Designation of Record & Issues on Appeal	275.00	1.66	456.50
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 11/30/16] Lyssette Morales Vidal: Continued research on due process & requirement in the law of hearing prior to dismissal	275.00	1.15	316.25
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 12/01/16] Lyssette Morales Vidal: Continued research on the issues to be stated in the Statement of Issues to be filed before BAP & continued to fine tune the Statement & Designation.	275.00	4.26	1,171.50
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 12/01/16] Lyssette Morales Vidal: Drafted & prepared letter to C13 Trustee & Baxter Credit Union inviting them to allow me to meet to discuss & evaluate possibility of settlement in lieu of continuing w/ effort & expense to of the parties in the appeal process	275.00	0.4	110.00

Task	Time Entry Notes	Rate	Hours	Line Total
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 12/02/16] Lyssette Morales Vidal: Final revision of Designation of Record comparing w/ Court's Legal Docket & final revision of Statement of Issues on Appeal & filed doc #129	275.00	2.4	660.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 12/02/16] Lyssette Morales Vidal: Research on requirement or not to seek Stay Pending Appeal	275.00	2.17	596.75
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 12/02/16] Lyssette Morales Vidal: Final revision of settlement letter to avoid long process of appeal to counsel for Baxter & posted the letter	275.00	0.2	55.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 12/03/16] Lyssette Morales Vidal: Continued research, drafting & revision of Mt Stay Pending Appeal in preparation for filing if settlement discussions fail w/ moving creditor in the dismissal, Baxter Credit Union	275.00	3.79	1,042.25
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 12/04/16] Lyssette Morales Vidal: Continued researching & revision of case law in PR District & by bankruptcy judge BKT in several cases wherein he has consistently denied Motions for Stay Pending Appeal to measure probability of success or failure in the attempt in order to decide filing or not the motion already prepared yesterday	275.00	2	550.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 01/16/17] Lyssette Morales Vidal: Prepared draft & once again performed computations to revisit LV w/ C13 Trustee & drafted email to these effects in a repeated attempt to settle since cost of Appeal is too burdensome to Ds.	275.00	1.87	514.25
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 01/28/17] Lyssette Morales Vidal: Once again re-did LV analysis to offer increased payout to Trustee in order to obtain preliminary approval of Trustee in furtherance of Stipulating Set Aside of Dismissal w/ BCU & prepared new C13 Plan to send draft to Trustee	275.00	3	825.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/05/17] Lyssette Morales Vidal: Continued organization of appellate brief by organizing Appendix & continued drafting of the Appellate brief & reading cases & law review articles found in prior legal research.	275.00	6.11	1,680.25
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/05/17] Lyssette Morales Vidal: Draft & filed Request for Leave to Add Omitted Docs to Designation of Record on Appeal	275.00	0.4	110.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/16/17] Lyssette Morales Vidal: Continued organizing appendix & table of contents	275.00	4.68	1,287.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/16/17] Lyssette Morales Vidal: Continued drafting of brief & correcting references to appendix	275.00	4	1,100.00

Task	Time Entry Notes	Rate	Hours	Line Total
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/17/17] Lyssette Morales Vidal: Continued drafting & refining appeal brief	275.00	3	825.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/17/17] Lyssette Morales Vidal: Continued drafting & refining appeal brief	275.00	5.66	1,556.50
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/18/17] Lyssette Morales Vidal: Continued drafting of appeal brief, organizing & preparing Appendix with corresponding marking of documents	275.00	5	1,375.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/19/17] Lyssette Morales Vidal: Continued arrangement & organization of Appendix Index & pagination of these	275.00	5.66	1,556.50
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/19/17] Lyssette Morales Vidal: Continued drafting & organization of appeal brief	275.00	4.68	1,287.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/20/17] Lyssette Morales Vidal: Continued drafting & reducing appeal brief	275.00	5	1,375.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 02/20/17] Lyssette Morales Vidal: Redid #s & re-evaluated LV & prepared a second alternate plan to send to Trustee for discussion in continued attempt to resolve w/o consummating Appeal	275.00	3	825.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/21/17] Lyssette Morales Vidal: Continued drafting of appeal brief while awaiting word from trustee to settle or not	275.00	5.26	1,446.50
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/21/17] Lyssette Morales Vidal: Drafted & filed Second Req x Ext or Stay of Deadliness in hopes of continuous settlement attempts by Ds. Appraisal paid for & obtained by Ds in further attempt to settle shows \$110,000 value.	275.00	0.2	55.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 02/22/17] Lyssette Morales Vidal: Corrected Second Request for Extension of Time or For Stay of Deadlines to File Appeal Brief & filed today at doc #9	275.00	0.4	110.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 03/06/17] Lyssette Morales Vidal: Continued drafting & research interchangeably as I drafted Appeal brief	275.00	8	2,200.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 03/15/17] Lyssette Morales Vidal: Organization & arrangement & verification of Appendix, Table of Contents, Table of Appendix of Appeal brief & supporting documents	275.00	12	3,300.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 03/16/17] Lyssette Morales Vidal: Continued drafting & editing of appeal brief	275.00	5	1,375.00

Task	Time Entry Notes	Rate	Hours	Line Total
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 03/17/17] Lyssette Morales Vidal: Preparation draft of Settlement Agreement for set aside Dismissal while Appeal pendng & sent via email to C13 Trustee & BCU counsel	275.00	1	275.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 03/17/17] Lyssette Morales Vidal: Last sweep of Appeal draft, Appendix & numbering in brief & all supporting documents & amended as per revision to prepare for filing if settlement is not accepted by Court	275.00	2	550.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 03/22/17] Lyssette Morales Vidal: Amended Designation of Record on Appeal & filed w/ BAP pursuant to Request to Add Omitted Record on original Designation of Record on Appeal	275.00	1	275.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 03/22/17] Lyssette Morales Vidal: Reviewed all emails to & from Trustee & BCU to verify acceptance of new Plan &/or answer draft of Stipulation & contacted them once again via email.	275.00	0.2	55.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 03/27/17] Lyssette Morales Vidal: Filed Appeal Brief, Index to Appendix & 12 Volumes of Appendix & later corrected filing on BAP's request via email, also drafted & added an omitted Statement of Related Case or Appeal omitted in original filing	275.00	2	550.00
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 03/28/17] Lyssette Morales Vidal: Drafted & filed Mt to Vacate & Set Aside Dismissal t doc #137 in Lieu of Appeal	275.00	1.4	385.00
Meetings	[Rafael Ramos Santos & Johana Marrero Bou 04/17/17] Lyssette Morales Vidal: Corresponded via email & telephonically w/ Ds to discuss status of case after vacated dismissal on 4/17/2017 & follow up on need to provide MORs due since dismissal to date, as well as installments to plan accrued during dismissal to be paid to Trustee in reactivated case	200.00	1	200.00
Appeal	[Rafael Ramos Santos & Johana Marrero Bou 04/18/17] Lyssette Morales Vidal: Drafted motion to voluntarily dismiss Appeal & filed w/ inordinate effort b/c CmEcf was experiencing problems &/or I was having difficulties filing thru CmEcf & called Pacer 3 times	275.00	1.5	412.50
CASE ADMINISTRATION	[Rafael Ramos Santos & Johana Marrero Bou 04/18/17] Lyssette Morales Vidal: Reviewed & adjusted proposed Plan discussed since 2/20/2017 w/ C13 Trustee & prepared for filing after reviewing the 4th Plan w/ debtors for a 3rd time for their approval for filing & drafted & prepared CoS w/ Notice of Plan & filed today at doc #140	275.00	2.2	605.00
FEE & EMPLOYMENT APPLICATION	04/30/2017 Organize Fresh Book task & time entries & Prepare Application for Compensation & Motion	275.00	2.85	783.75

Task	Time Entry Notes	Rate	Hours	Line Total
FEE & EMPLOYMENT APPLICATION	[Rafael Ramos Santos & Johana Marrero Bout 04/30/17] Lyssette Morales Vidal: Preparation of Fee Application & substantial reduction to enable confirmation of last Plan.	275.00	2.79	767.25

Item	Description	Unit Cost	Quantity	Line Total
Expense	[Rafael Ramos Santos & Johana Marrero Bou 11/03/16] Pacer: Appeal Fee	298.00	1	298.00
Expense	[Rafael Ramos Santos & Johana Marrero Bou 09/08/16] Parking: Confirmation Hearing	3.25	1	3.25
Expense	[Rafael Ramos Santos & Johana Marrero Bou 07/07/16] Printing, Zerox	0.25	200	50.00
Expense	[Rafael Ramos Santos & Johana Marrero Bou 07/07/16] Parking: Confirmation Hearing	3.25	1	3.25
Expense	[Rafael Ramos Santos & Johana Marrero Bou 05/12/16] Parking: Meeting w/ Trustee	3.25	1	3.25
Expense	[Rafael Ramos Santos & Johana Marrero Bou 04/28/16] Parking: Confirmation Hearing	5.25	1	5.25
Expense	[Rafael Ramos Santos & Johana Marrero Bou 02/23/16] Parking: §341 Meeting C13	4.10	1	4.10

Subtotal	62,110.60
Discount - 45%	-27,949.77
Total	34,160.83
Amount Paid	-8,485.00
Balance Due (USD)	\$25,675.83

Terms

Debtors have paid Atty a deposit of \$8,485 in total. Atty will forego difference of A/F generated at a gross \$62,10.60 to confirm Plan at a substantial discount of approx 45%; should any funds become available in the future of the Plan & case, Atty reserves right to those funds until at least \$25,675.83 is completed. Atty will accept & limit A/F at \$10,000 under the latest proposed Plan for confirmation purposes.